

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN SECTION OF TENNESSEE
WESTERN DIVISION

SCOTT TURNAGE , CORTEZ D.)	
BROWN, DEONTAE TATE, JEREMY S.)	Case No. 2:16-cv-2907-SHM/tmp
MELTON, ISSACCA POWELL, KEITH)	
BURGESS, and TRAVIS BOYD on behalf)	
of themselves and all similarly situated)	
persons,)	
)	
PLAINTIFFS,)	CLASS ACTION COMPLAINT FOR
)	VIOLATIONS OF THE CIVIL RIGHTS
v.)	ACT OF 1871, 42 U.S.C. § 1983, AND
)	TENNESSEE COMMON LAW
)	
)	
BILL OLDHAM, in his individual capacity)	
and in his official capacity as the Sheriff of)	JURY TRIAL DEMANDED
Shelby County, Tennessee; ROBERT)	PURSUANT TO FED. R. CIV. PRO.
MOORE, in his individual capacity and in)	38(a) & (b)
his official capacity as the Jail Director of)	
the Shelby County, Tennessee;)	
CHARLENE McGHEE, in her individual)	
capacity and in her official capacity as the)	
of Assistant Chief Jail Security of Shelby)	
County, Tennessee; DEBRA HAMMONS,)	
in her individual capacity and in her official)	
capacity as the Assistant Chief of Jail)	
Programs of Shelby County, Tennessee;)	
SHELBY COUNTY, TENNESSEE, a)	
Tennessee municipality; and TYLER)	
TECHNOLOGIES, INC., a foreign)	
corporation)	
)	
)	
DEFENDANTS.)	

MOTION AND MEMORANDUM IN SUPPORT FOR WITHDRAWAL OF JOSHUA
SPICKLER AS COUNSEL OF RECORD

Plaintiffs Scott Turnage, Cortez D. Brown, Deontae Tate, Jeremy S. Melton, Issacca Powell, Keith Burgess, and Travis Boyd move the Court to enter an Order allowing Attorney Joshua Spickler to withdraw as counsel of record and, in support of their Motion, state as follows:

Memorandum of Facts and Law in Support of Motion

1. Plaintiffs request that Joshua Spickler be permitted to withdraw from this case as counsel of record.
2. The Plaintiffs will continue to be represented Michael G. McLaren, William E. Cochran, Jr., Brice Moffatt Timmons, Frank L. Watson, William F. Burns, Claiborne Ferguson, and Joseph Z. Ozment.
3. The withdrawal, if granted, will not prejudice the Defendants, and will cause no delay in this civil action.
4. Pursuant to Local Rule 7.2(a)(1)(B), counsel for Plaintiffs counsel has consulted with Defendants' counsel and Defendants' counsel does not object to the relief sought in this Motion. *See* Certificate of Consultation by Counsel.
5. A proposed Order granting the Motion will be emailed to the Court.

WHEREFORE, Plaintiffs respectfully request that the Court enter an Order allowing Joshua Spickler to withdraw as counsel of record.

Respectfully submitted,

/s/ Joshua Spickler

Joshua Spickler
902 South Cooper Street
Memphis, TN 38104

CERTIFICATE OF CONSULTATION BY COUNSEL

On September 13, 2017, Plaintiffs' consulted via electronic mail with counsel for Defendants, concerning the matters set forth in this Motion and Memorandum. Defendants' counsel advised that they *do not object* to the relief sought.

CERTIFICATE OF SERVICE

The foregoing document was filed via the Court's CM/ECF system, automatically effecting service on counsel of record for all other parties to this action, on this 13th day of September, 2017.

s/ Josh Spickler